

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Region I - EPA New England**

ENFORCEMENT CONFIDENTIAL – ATTORNEY CLIENT COMMUNICATION

**DATE:** 3/2/15

**SUBJECT:** CWA Compliance Determination Memorandum for 9/23/14 Compliance  
Evaluation Inspection of the Global Petroleum Corporation Terminal

**FROM:** Neil Handler, Water Technical Unit

**TO:** Jeff Kopf, Senior Legal Counsel

**I. Facility Information**

A. Facility Name:	Global Petroleum Corporation Terminal
B. Facility Address:	71 & 140 Lee Burbank Highway, Revere MA 02151
C. Facility Contacts:	Donald Janik, Terminal Manager 617-660-1152 <a href="mailto:djanik@globalp.com">djanik@globalp.com</a>  Ashwin Patel, Arlington Associates Consultant 617-293-1512 <a href="mailto:arlassociates@yahoo.com">arlassociates@yahoo.com</a>
D. SIC Codes:	5171 (Petroleum Bulk Stations & Terminals) 4491 (Marine Cargo Handling)
E. Type of Source:	Industrial Stormwater at a Bulk Fuel Storage Terminal
F: Date permit issued:	June 30, 2005 (New Permit issued 9/24/14)
G: Permit #:	MA0003425
H. Parent Company:	Global Petroleum Corporation

**II Background Information**

A. Date of inspection:	9/23/14
B. Weather Conditions:	Sunny, Approximately 60° Fahrenheit
C. US EPA Representative(s):	Neil Handler
D. State Representative(s):	none
E. Federally Enforceable Requirements Covered During the Inspection:	NPDES Permit Conditions, Section 301(a) of the CWA

### III Compliance Determination

#### A. Description of owner, operator and relationship:

The facility operates a bulk fuel terminal which is engaged in the receipt, storage and distribution of petroleum products. A majority of the bulk petroleum products are stored within the facility's tank farm located at 71 Lee Burbank Highway. However, there are several smaller above ground storage tanks containing fuel as well as fuel additives located nearby the office and truck loading area located at 140 Lee Burbank Highway (on the opposite side of Route 1A). The terminal receives bulk quantities of petroleum products via ship and barge at two co-owned marine vessel docks. The docks are located behind the terminal along the Chelsea River.

The NPDES discharge at this facility consists of stormwater from pervious and impervious areas at the facility including the tank farm and terminal yard and treated groundwater from an onsite remediation system. The groundwater remediation system was installed under the Massachusetts Contingency Plan (MCP) to address a historic gasoline spill which occurred in and around the loading rack area. A new groundwater remediation system was constructed and brought online in 2005 to provide better treatment and easier maintenance. The new remediation system also allowed the facility to target specific hot spots either through vapor and/or groundwater extraction.

On occasion, the facility will discharge water used in the hydrostatic testing of recently repaired tanks. The NPDES permit also allows stormwater accumulated in the tank farm of the Global Petroleum Corporation Terminal to be transferred to the Global South Terminal for treatment under certain wet weather conditions. Two internal outfalls were created in the NPDES permit to identify different treatment limits and permit conditions for stormwater versus groundwater. Outfall 002 identifies the permit conditions for stormwater and hydrostatic test water treated using an onsite oil-water separator. Outfall 003 contains the permit conditions for the effluent from the groundwater remediation system. Outfall 001, which contains the discharge from both internal Outfalls 002 and 003, is discharged to the Chelsea River.

#### B. Pollutant(s):

Total Suspended Solids, oil & grease, BTEX, pH, PAHs, MTBE

#### C. Point of Discharge:

## Outfall 001

D. Waters of the United States:

Yes, Chelsea River

E. Violations: See Discussion Below

## STORMWATER

During the inspection of the Global Petroleum Corporation Terminal it was noted that the oil-water separator was cleaned by Clean Harbors on 6/23/14 in compliance with the preventative maintenance cleaning frequency of once per year as identified in Section 7.3.2 of the Integrated Contingency Plan (dated 8/15/11). Most of the separator was covered but there wasn't any evidence of petroleum product on the surface of the small section that was visible. The lift station used to pump stormwater to the oil-water separator was also inspected and there wasn't any evidence of petroleum product on the surface or odors detected at the time of the EPA inspection.

EPA also inspected the groundwater remediation system. As of December 2013, the facility met the MCP groundwater remediation standard (GW-2) and the treatment system was placed in standby mode. The facility continues to complete quarterly groundwater monitoring to confirm that the MCP groundwater remediation standard has been met. During this monitoring phase, the groundwater remediation system is being operated once per month for two days to keep the treatment system operational.

The inspection of the Global Petroleum tank farm did show some small accumulation of silt around some catch basins. However, most of the tank farm surface is covered with gravel which appears to be controlling and minimizing any soil runoff. There were some small amounts of standing water in several of the bermed areas within the tank farm at the time of the inspection.

A review of the DMR sampling data reported by the facility over the past five years (through May of 2014) shows that the Global Petroleum Corporation terminal has had some intermittent exceedances of its permit conditions for primarily volatile organic compounds associated with petroleum products. The most recent exceedance occurred in February 2014 at which time the facility determined that contaminated groundwater was seeping into several catch basins nearby the fuel loading rack. In order to treat the contaminated groundwater mixing with stormwater, the facility took the flow from internal Outfall 002 and pumped it over to the groundwater remediation system. This also allowed the facility to seal the affected catch basins. Outfall 002 was placed back in service around July 2014.

## **SWPPP**

The Stormwater Pollution Prevention Plan (SWPPP) requirements identified in the facilities NPDES permit requires that the facility include the sweeping of paved areas at a frequency of no less than twice per year. The Global South Terminal (as well as other nearby Global facilities) uses an Integrated Contingency Plan (dated 8/15/11) as its means for identifying how it will control onsite activities/operations which could contribute pollutants via stormwater discharges to water of the US in lieu of preparing a Stormwater Pollution Prevention Plan (SWPPP). The NPDES Permit requires that the permittee provide annual certification to EPA and MassDEP documenting that the previous year's inspections and maintenance activities were conducted and the facility is in compliance with the SWPPP. There was no documentation available at the time of the inspection showing that the facility had complied with this annual recertification requirement. When this fact was shared with Global South Terminal representatives they said that would confirm whether such certification had ever been completed and would share the results with EPA. On September 30, 2014, EPA received an email from Tom Keefe with a copy of the annual certification letter dated September 23, 2014. The annual certification for the previous year's activities is to be sent to EPA and MassDEP as well as appended to the SWPPP by September 30<sup>th</sup> of each year.

F. Recommended Next Steps: None